

FILED

DEC 16 2021

**Clerk, U.S. District and
Bankruptcy Courts**

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

| | | |
|---------------------------------|---|-------------------------------|
| UNITED STATES OF AMERICA | : | |
| | : | |
| v. | : | HON. RUDOLPH CONTRERAS |
| | : | |
| ROBERT CHAPMAN, | : | Crim. No. 21-CR-676 |
| a/k/a Robert Erick | : | |
| | : | |
| Defendant. | : | |

STATEMENT OF OFFENSE

Pursuant to Federal Rule of Criminal Procedure 11, the United States of America, by and through its attorney, the United States Attorney for the District of Columbia, and the defendant, Robert Chapman, a/k/a “Robert Erick” (hereinafter “Chapman”) with the concurrence of his attorney, agree and stipulate to the below factual basis for the defendant’s guilty plea—that is, if this case were to proceed to trial, the parties stipulate that the United States could prove the below facts beyond a reasonable doubt:

The Attack at the U.S. Capitol on January 6, 2021

The U.S. Capitol, which is located at First Street, SE, in Washington, D.C., is secured 24 hours a day by U.S. Capitol Police. Restrictions around the U.S. Capitol include permanent and temporary security barriers and posts manned by U.S. Capitol Police. Only authorized people with appropriate identification are allowed access inside the U.S. Capitol.

On January 6, 2021, the exterior plaza of the U.S. Capitol was closed to members of the public. On that day, a joint session of the United States Congress convened at the United States Capitol. During the joint session, elected members of the United States House of Representatives and the United States Senate were meeting in separate chambers of the United States Capitol to certify the vote count of the Electoral College of the 2020 Presidential Election, which had taken

place on November 3, 2020. The joint session began at approximately 1:00 p.m. Shortly thereafter, by approximately 1:30 p.m., the House and Senate adjourned to separate chambers to resolve a particular objection. Vice President Mike Pence was present and presiding, first in the joint session, and then in the Senate chamber.

As the proceedings continued in both the House and the Senate, and with Vice President Pence present and presiding over the Senate, a large crowd gathered outside the U.S. Capitol. As noted above, temporary and permanent barricades were in place around the exterior of the U.S. Capitol building, and U.S. Capitol Police were present and attempting to keep the crowd away from the Capitol building and the proceedings underway inside. At approximately 2:00 p.m., certain individuals in the crowd forced their way through, up, and over the barricades, and officers of the U.S. Capitol Police, and the crowd advanced to the exterior façade of the building. The crowd was not lawfully authorized to enter or remain in the building and, prior to entering the building, no members of the crowd submitted to security screenings or weapons checks by U.S. Capitol Police Officers or other authorized security officials.

At such time, the certification proceedings were still underway and the exterior doors and windows of the U.S. Capitol were locked or otherwise secured. Members of the U.S. Capitol Police attempted to maintain order and keep the crowd from entering the Capitol; however, shortly after 2:00 p.m., individuals in the crowd forced entry into the U.S. Capitol, including by breaking windows and by assaulting members of law enforcement, as others in the crowd encouraged and assisted those acts. The riot resulted in substantial damage to the U.S. Capitol, requiring the expenditure of more than \$1.4 million dollars for repairs.

Shortly thereafter, at approximately 2:20 p.m., members of the United States House of Representatives and United States Senate, including the President of the Senate, Vice President

Pence, were instructed to—and did—evacuate the chambers. Accordingly, all proceedings of the United States Congress, including the joint session, were effectively suspended until shortly after 8:00 p.m. the same day. In light of the dangerous circumstances caused by the unlawful entry to the U.S. Capitol, including the danger posed by individuals who had entered the U.S. Capitol without any security screening or weapons check, Congressional proceedings could not resume until after every unauthorized occupant had left the U.S. Capitol, and the building had been confirmed secured. The proceedings resumed at approximately 8:00 p.m. after the building had been secured. Vice President Pence remained in the United States Capitol from the time he was evacuated from the Senate Chamber until the session resumed.

Robert Chapman's Participation in the January 6, 2021, Capitol Riot

On or about January 6, 2021, the defendant, Chapman traveled to Washington, D.C. from Carmel, New York, to hear then-President Donald J. Trump speak. After attending the rally, Chapman walked to the United States Capitol Building. While walking to the Capitol Building, Chapman utilized his telephone to photograph himself walking to the Capitol Building. At approximately 2:30 p.m., Chapman entered the Capitol Building. While inside of the Capitol Building, Chapman entered Statuary Hall and the Capitol Rotunda where he took photographs of himself that he would later post on his social media platforms. Chapman was inside of the Capitol Building for approximately forty-five minutes before exiting the building.

After exiting the Capitol Building, Chapman communicated with Individual-1 on the dating app, Bumble. While communicating with Individual-1, Chapman admitted to entering the Capitol Building on January 6, 2021. Chapman wrote, "I did storm the Capitol. I made it all the way to Statuary Hall. Did an interview with Robert O'Morrow of the Washington Post. Also did an online interview with Jess Brevins of the WSJ."

On January 7, 2021, a friend of Chapman, Individual-2, posted a picture to his/her Facebook page that he/she received from Chapman. The picture was taken by Chapman while he was inside of Statuary Hall. Individual posed a caption with the picture. The caption read, "My dear friend and Brostar Robert made it in the Capitol building at the protest yesterday . . . Woou Hooooooooo!!!!"

Chapman utilized his own Facebook page to post images of himself inside of the Capitol Building. In one post, Chapman posted a picture with the caption, "I'm fuckin inside the Crapitol!!!" Chapman's Facebook posts show him inside of Statuary Hall and the Capitol Rotunda.

Chapman knew at the time he entered the U.S. Capitol Building that that he did not have permission to either enter the U.S. Capitol Building or parade, demonstrate, or picket inside of the building.

Respectfully submitted,

MATTHEW M. GRAVES
United States Attorney
D.C. Bar No. 481052


By: /s/ Brittany L. Reed
BRITTANY L. REED
Assistant United States Attorney
Trial Attorney – Detailee
La. Bar No. 31299
650 Poydras Street, Ste. 1600
New Orleans, Louisiana 70130
Brittany.Reed2@usdoj.gov
(504) 680-3031

DEFENDANT'S ACKNOWLEDGMENT

I, Robert Chapman, a/k/a "Robert Erick," have read this Statement of the Offense and have discussed it with my attorney. I fully understand this Statement of the Offense. I agree and acknowledge by my signature that this Statement of the Offense is true and accurate. I do this voluntarily and of my own free will. No threats have been made to me nor am I under the influence of anything that could impede my ability to understand this Statement of the Offense fully.

Date:

12/13/21


Robert Chapman, a/k/a Robert Erick
Defendant

ATTORNEY'S ACKNOWLEDGMENT

I have read this Statement of the Offense and have reviewed it with my client fully. I concur in my client's desire to adopt this Statement of the Offense as true and accurate.

Date:

12-13-21


Thomas Young
Attorney for Defendant